

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Revision of the Commission's Rules To Enhance Compatibility With Enhanced 911 Emergency Calling System

CC Docket No. 94-102

To: The Commission

Carrier Report Regarding Implementation of Wireless E911 Phase II Automatic Location Identification

Unicom, Inc., (“Unicom”) hereby submits a report regarding implementation of wireless E911 Phase II Automatic Location Identification (“ALI”), in compliance with the Federal Communications Commission’s (“FCC” or “Commission”) *Further Memorandum Opinion and Order* in the above-captioned proceeding.

1. Background/Contact Information

Unicom serves portions of rural Alaska and its contact information is as follows:

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President
Unicom, Inc. TRS #801907
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Anchorage, Alaska 99518
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fax: 907-563-3185

II. E911 Phase II Location Technology Information

If required, Unicom will chose to deploy a handset-based solution for its Phase II ALI technology. Unicom is exploring the offerings of some handset vendors. Unicom would utilize the same technology, once selected, throughout its service area, although, as noted below, that service area could shrink if Unicom is required to purchase new switches.

1 III. Testing and Verification

2 Based on the circumstances, Unicom has not engaged in any testing of equipment.

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4 IV. Implementation Details and Schedule

5 Unicom has viewed implementation as contingent upon receiving a request from a Public Safety
6 Answering Point (“PSAP”) for E911 information. At the present time, only the Police Department of
7 the City of Bethel has installed 911 equipment at their offices which is capable of providing address
8 information for traditional local loop. The Police Department’s 911 system is not capable of receiving
9 location information from cellular systems. The predecessor in interest to United-KUC, Inc., one of
10 Unicom’s affiliates, provided the initial 911 equipment to the City of Bethel and supports that
11 equipment. There appears to be no interest at this time in upgrading the equipment to facilitate wireless
12 E911 location service. There are no other public safety agencies in Unicom’s service area have or will
13 achieve Public Safety Answering Points (“PSAPs”) status at this time,¹ although the City of Mountain
14 Village has just requested that 911 calls be fouted to a dedicated telephone at the police station.

15 Unicom is seeking a wavier of Section (1) of Paragraph (g) of 47 CFR 20.18 which requires that it begin
16 selling and activating location-capable handsets no later than October 1, 2001. Unicom does not believe
17 that it is practical or reasonable to require Unicom’s customers to purchase new handsets when the
18 public safety agencies in the service area have no current plans to upgrade their equipment and provide
19 E911 services.

20 As explained in Unicom’s waiver request, if required to do so, full E911 implementation would require
21 Unicom to make substantial expenditures that it otherwise would not make, and such expenditures
22 would place a severe strain on Unicom’s limited financial resources. Compliance would exceed the
23 financial viability of Unicom as a cellular carrier and could likely result in a discontinuation of service
24 to customers.

25 Additional decisions about Unicom’s E911 schedule will depend upon the Commission’s disposition
26 of Unicom’s wavier request.

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28 V. PSAP Interface

29 Unicom has not received any requests from a Public Safety Answering Point regarding E911 service.

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31 VI. Existing Handsets

32 Unicom awaits the Commission’s disposition of Unicom’s waiver request as it pertains to handset
33 upgrades.

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36 ¹ Alaska Statutes 29.35.131 – .137 control the provision of 911 and E991 services by local
37 governments.

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Respectfully submitted,
UNICOM, INC.

Dated: _____

By: _____
Mark K. Johnson, Counsel